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Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

J.C., *et al.*,

Plaintiffs,

V.

KRISTI NOEM, Secretary of the United States
Department of Homeland Security, *et al.*,
a, *et al.*,

Case No. 4:25-cv-03502 JSW

**STIPULATION TO EXTEND TIME FOR
DEFENDANTS' RESPONSE TO PLAINTIFFS'
COMPLAINT; AND [PROPOSED] ORDER**

Defendants.

Plaintiffs and Defendants hereby stipulate and respectfully request the Court to extend the deadline for Defendants' response to Plaintiffs' complaint. Defendants will file their response on or before July 23, 2025. The parties make this request because Defendants need a brief period of additional time to prepare their response to the complaint.

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**Stipulation to Extend
C 4:25-cv-03502 JSW**

1 Dated: June 23, 2025

Respectfully submitted,¹

2 CRAIG H. MISSAKIAN
United States Attorney

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4 /s/ Elizabeth D. Kurlan
ELIZABETH D. KURLAN
5 Assistant United States Attorney
6 Attorneys for Defendants

7 Dated: June 23, 2025

8 /s/ Zachary Nightingale
ZACHARY NIGHTINGALE
9 JOHN N. SINODIS
Attorneys for Plaintiffs

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12 [PROPOSED] ORDER

13 Pursuant to stipulation, IT IS SO ORDERED. Defendants will file their response to Plaintiffs'
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complaint by July 23, 2025.

16 Date:

17 JEFFREY S. WHITE
18 United States District Judge

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27 ¹ In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all
signatories listed herein concur in the filing of this document.

DECLARATION OF ELIZABETH D. KURLAN

I, Elizabeth D. Kurlan, declare and state as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Northern District of California and counsel of record for the federal Defendants in the above-captioned action.

2. On April 22, 2025, Plaintiffs filed a complaint in which they challenge the termination of their records in the Student Exchange and Visitor Information System. *See* Dkt. No. 1. Our office was served with the complaint on April 23, 2025.

3. On June 18, 2025, I contacted Plaintiffs' counsel regarding Defendants' request for an extension of time to prepare their response to the complaint, and Plaintiffs consented to the request.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: June 18, 2025

/s/ Elizabeth D. Kurlan
ELIZABETH D. KURLAN
Assistant United States Attorney